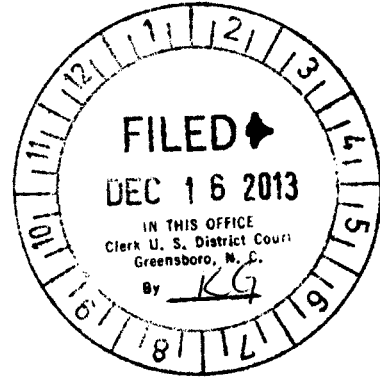


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

MARK JUSTIN DANIELS

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1:13CR 473-1

The Grand Jury charges:

COUNT ONE

1. At all times material to this Indictment, Food Lion, located at 6810 Shallowford Road, Lewisville, North Carolina, was engaged in the commercial activities of a grocery store business, in interstate and foreign commerce and in an industry that affected interstate and foreign commerce.

2. On or about August 16, 2013, in the County of Forsyth, in the Middle District of North Carolina, MARK JUSTIN DANIELS did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that MARK JUSTIN DANIELS did knowingly and unlawfully take and obtain property consisting of approximately \$285.00 of United States currency belonging to Food Lion, 6810 Shallowford Road, Lewisville, North Carolina, from the possession of an employee of the said business against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his

person, that is, by threatening the employee and demanding United States currency; in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

On or about August 19, 2013, in the County of Forsyth, in the Middle District of North Carolina, MARK JUSTIN DANIELS, by force and violence and by intimidation, did take from the presence of a bank employee, money in the approximate sum of \$5,500.00, belonging to and in the care, custody, control, management, and possession of State Employees' Credit Union, 1025 South Peace Haven Road, Clemmons, North Carolina, the deposits of which were then insured by the National Credit Union Administration Board, and in committing this offense did assault and put in jeopardy the life of the said bank employee by the threatened use of dangerous weapons, that is, a handgun and a destructive device; in violation of Title 18, United States Code, Section 2113(a) and (d).

A TRUE BILL:



ANDREW C. COCHRAN
SPECIAL ASSISTANT UNITED STATES ATTORNEY



RIPLEY RAND
UNITED STATES ATTORNEY